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IN THE UNITED STATES DISTRICT FOR  
THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JOE HOLCOMBE, et. al,	§	NO. 5:18-CV-00555-XR
	§	
Plaintiffs	§	Consolidated with:
	§	5:18-cv-00712-XR ( <i>Vidal</i> )
	§	5:18-cv-00881-XR ( <i>Uhl</i> )
vs.	§	5:18-cv-00944-XR ( <i>Ramsey</i> )
	§	5:18-cv-00949-XR ( <i>McNulty</i> )
UNITED STATES OF	§	5:18-cv-00951-XR ( <i>Wall</i> )
AMERICA,	§	5:18-cv-01151-XR ( <i>Amador</i> )
	§	5:19-cv-00184-XR ( <i>Brown</i> )
Defendant	§	5:19-cv-00289-XR ( <i>Ward</i> )
	§	5:19-cv-00506-XR ( <i>Workman</i> )
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	§	5:19-cv-00805-XR ( <i>Curnow</i> )
	§	5:19-cv-00806-XR ( <i>Macias</i> )

**DECLARATION**

I am H [REDACTED] M. M [REDACTED], and I declare the following as true and correct:

- 1) I am of sound mind, am sixteen (16) years old, and have personal knowledge of the facts contained in this declaration.
- 2) On November 5th, 2017, my life was altered forever as my family and I sat in The First Baptist Church of Sutherland Springs. I started to hear unusual loud noises that sounded like fireworks. Quickly, my mother shoved me under the church pews, and everyone started a panic screaming.

- 3) The shooter, Devin Kelley, was walking up and down the middle aisle of the church. Soon after, he came in and shot me in the back. My mother was talking me through the situation and telling me to remain calm but it was very hard hearing all the screaming and yelling.
- 4) My brother, J [REDACTED] M [REDACTED], and my great aunt, Margret McKenzie, were to the side of me, but I could not see them the way I was on the floor.
- 5) My mother called 911 on her phone but the lines were busy, so no calls were going through. In my head, I thought I wasn't going to make it out alive, so I made a goodbye call to my boyfriend at the time.
- 6) My white shirt was completely covered in blood and while I was trying to figure out how to lay to stop the bleeding as the best as I could, I came to realize my left leg had been shot. After this, I decided to lay on my left side so that hopefully it would slow the bleeding.
- 7) The way I was laying, I could not see my mom, but I could see Grumpy Brian Holcombe. He was covered in blood and I could tell he was passed away and no longer with us. Soon after I realized that Grumpy was gone, the shooting stopped, and Devin Kelley was reloading his gun. It was very smoky in there and he had the audacity to say, "Man guys, it's really smoky in here." When he said that, it made me livid and I really wish I could do something. But then the shooting continued and then he went back down the aisle to the door of the church.
- 8) I rolled over to see my mom. I saw her and I knew something wasn't right. I yelled her name and shook her, and nothing happened. That's when I realized she had passed. After I saw my mom had passed, I started to give up. I laid there and my vision was going out. I couldn't feel my body and I could barely hear anything at all. I heard faint yells and screams from other members of the church. I blacked out.
- 9) Then, I remember hearing my grandmother's voice. She was talking to the paramedics telling them where we were and then one of them pulled me into the aisle and began to bandage me up the best they could until we could get to the hospital.
- 10) While all this was happening, I heard my brother crying because his leg was stuck underneath a pew that broke and fell. Once they got me bandaged, they brought me to an ambulance and sat me in the back of it. Once the paramedics got my brought and great aunt out, they put J [REDACTED] and I in the same ambulance and my great aunt rode in the truck with my grandma to the hospital.

- 11) The ambulance ride was long, and I kept blacking out and waking up. I don't remember much until I woke up in my room. J [REDACTED] and I stayed in the hospital for ten days.
- 12) The day after we got out, we attended the Holcombe funeral on November 15, 2017. Then Friday, we had my mother's viewing. Saturday November 18, 2017 was my mom's funeral and many family members and friends came down to be there.
- 13) My mom and I were best friends and having to lay her to rest knowing I would never see her again was the hardest thing I have done in my life. In the months after, my brother and I attended many doctor appointments and therapy sessions. We will never be the same people that were before, and we will carry this with us for the rest of our lives. The scars on our bodies and hearts will be a daily reminder that something must be done.

Under 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on this 16th day of August, 2019.

H.M. [REDACTED]  
H.M. [REDACTED] (Aug 17, 2019)

SIGNATURE OF H [REDACTED] M. M [REDACTED]

IN THE UNITED STATES DISTRICT FOR  
THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JOE HOLCOMBE, et. al,	§	NO. 5:18-CV-00555-XR
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**DECLARATION OF LISA MCNULTY**

I am Lisa McNulty, and I declare the following as true and correct:

- 1) I am of sound mind, over the age of 18, and have personal knowledge of the facts contained in this declaration.
- 2) In November of 2017, my sister was visiting from New York State. She had been staying with me at my home and was going to spend Sunday November the 5th with my daughter, Tara and the kids, H [REDACTED] and J [REDACTED]. They were going to attend church and then have lunch and spend the afternoon together. This plan was cut short.

**Ex. B**

- 3) I was at work and I received a text that read "someone is shooting up the church, call the police". So I called 911 immediately. My boss asked what was going on and I showed her the text, she said you better go.
- 4) So, I took off as fast as I could. I was not even a mile from work when I got a call from H[REDACTED]. She was hysterical and said "Nana, I have been shot." I was devastated, I told her I am coming and so is the police.
- 5) I drove like a maniac to the church (7 miles away). I flew up onto the church lawn. I tried to get up to the building but was told it was not secure and to stay back. I went around behind the EMS vehicles and went into the building with the first responders. There were spent gun magazines laying on the sidewalk.
- 6) H[REDACTED] was the first person that was taken out, she went straight to an ambulance because she had a chest wound and was critical. Tara was face down on the floor in front of where I was standing. I knelt down and tried to find a pulse, there wasn't one. Then, I saw it: the hole in the back of her head. I couldn't breathe. I put my hand on her shoulder and said, "I love you and I don't want to leave you but I have to get the kids out of here".
- 7) J[REDACTED] was yelling "Nana, help!" from the row behind Tara. He was kind of twisted up I could see the flesh dangling off his arm. I said let me help you, and he said I can't move my leg. Just as I was trying to move him, another EMS person came and scooped him up. He was laid on the sidewalk, his leg was blown apart, bone was sticking out. I saw my sister trying to get up, I said, "are you shot?" and she said, "I don't know." I took her to my vehicle. She called me back and told me her pants are wet, and she had been shot in the upper leg. I helped her to the sidewalk next to J[REDACTED].
- 8) I returned into the church. I spoke to Tara again, pronouncing your own child dead is the worst possible experience a parent can have. I grabbed Tara's purse and phone, also J[REDACTED]' phone, and my sister's purse. I took these items to the vehicle, and I lent my phone to a teenager who wanted to call his mom. I later learned his name was Z[REDACTED]. His grandma had been killed too.
- 9) I was going in and out checking for life. Then an EMS person grabbed J[REDACTED] to put him into an ambulance, and I asked them to put them in the ambulance with his sister, which they did. I had a neighbor grab my sister and put her into my vehicle and we followed the ambulance to the hospital.
- 10) I will never forget the vision of bodies piled on top of each other, of sobs, and of the blood. To the right was where the Holcombe family normally sat, I saw little N[REDACTED], not yet 2, I knew, I just knew. I saw to the left,


bodies leaning against the wall, limbs laying out from under the pews, this was a war zone, not a church, not a gathering of friends and neighbors, this was a highly well planned ambush and someone has to be held accountable.

11) I will never forget every day and night listening to the children cry in pain, cry for their mom, cry for the situation they had no right being in.

12) Now, nearly 2 years later, J [REDACTED] is in a brace because he cannot run. J [REDACTED] and his sister live with their grandmother, because they have no one else.

Under 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on this 16th day of August, 2019.

  
Lisa McNulty (Aug 16, 2019)

SIGNATURE OF LISA MCNULTY

IN THE UNITED STATES DISTRICT FOR  
THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

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**DECLARATION OF JUAN IGNACIO MACIAS**

I am Juan Ignacio Macias, and I declare the following as true and correct:

- 1) I am of sound mind, over the age of 18, and have personal knowledge of the facts contained in this declaration.
- 2) On Sunday, November 5, 2017, my wife and daughter decided to stay home from church. I thank God that I went to First Baptist Church in Sutherland Springs by myself that day and that they were not with me.
- 3) On that day, I mingled around a bit and then went to sit in the third pew back from the front on the right side. I was by myself in that row. There was a couple in the pew in front of me, and there were two



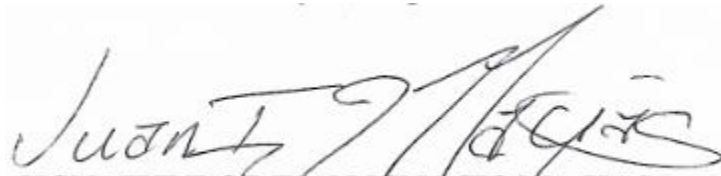
- couples in the pew behind me. For one of those couples, it was their first time to come to our church. All of them died that day.
- 4) Our Pastor wasn't there that Sunday, so we were goofing around and joking a little bit. Our services usually start with a song, and we started with a song that day. Then a lady got up to do announcement, and we heard a gunshot. We looked around, but we kind of assumed it was kids out shooting. So the lady kept talking. But then we heard a couple more shots, and one came through a window on the right side. I yelled to everyone to get down. I still thought was kids at that point.
  - 5) I was laying on my belly with my head and arms in the middle of the aisle. I was just starting to call 911 when I got shot in my left bicep. I started crawling back into the aisle and looked left towards the entrance to the church. I saw a short chubby guy in all black. I could see that he had an AR-15 or M-4 and was walking up the aisle.
  - 6) I remember that he was shooting at the front, and the bullet went into the podium. The lady screamed and started to hide behind it. Then he shot through the podium. The shot hit her while she was trying to hide. I remember seeing her start to crawl out and then decide to go back behind it.
  - 7) As he was walking up the aisle, he'd turn to each side and shoot a couple of rounds. At that time, when I realized what was going on, I was moving to go around him and got shot in my left hip. After that, I couldn't move my legs, so I crawled on my elbows.
  - 8) Then he got up to where I was and was shooting down at me. I got shot four times on my backside—near the creases of my backside and on both sides higher up near my waistline. I remember getting two of the shots in the rear. I'm not sure when I got the other shots. But he would leave and come back. He walked back to the center of the aisle and then would come back near me. I was blacking out a bit around this time.
  - 9) At one point I was laying on my back and was completely under a pew. I looked to the right and saw the man who had been sitting in front of me laying there. He wasn't dead yet, but I knew he was going to die real quick. Then I heard a little girl calling to me from the left and saying she was scared. So I whispered to her to sing a song with me. We sang "Jesus Loves Me" real soft.
  - 10) The next thing I saw was his feet in the aisle facing me. He took a couple shots at me and hit me in the stomach and then walked off. I saw a

bullet hole above my head in the pew. I think I blacked out for a little bit around that time.

- 11) I remember one lady saying "he's going to kill us all" at some point. And I remember thinking that she needed to be quiet because he would know she was still alive.
- 12) After it was obvious the shooter had left, I turned to a lady who was a surgical nurse and told her to start doing triage, and she did. Then one of the deputy sheriffs walked in. He had only been on the job for maybe a month or so. I gave him a situation report ("SITREP"). They were doing triage in church at the time, and there were lots of people there. They took me out on a stretcher and laid me in the grass. A friend of my daughter came over to me. I had him put his fingers in some of my bullet holes to help stop the bleeding. He saved my life. I saw some other people were helicoptered out. Then I was helicoptered out.
- 13) Overall, I have ten bullet holes in my body. I know the one in my arm was a through-and-through. Most of the others were not. I know that some of the bullets shattered and turned into shrapnel inside me, which is what caused me to have permanent internal damage and require my ostomy bag.

Under 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on this 14<sup>TH</sup> day of August, 2019.



SIGNATURE OF JUAN IGNACIO MACIAS

IN THE UNITED STATES DISTRICT FOR  
THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

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	§	5:19-cv-00806-XR ( <i>Macias</i> )

**DECLARATION**

I AM Margaret McKenzie, and I declare the following as true and correct:

1. I am of sound mind, over the age of 18, and have personal knowledge of the facts contained in this declaration.
2. That I am a resident of Saratoga Springs, New York and a citizen of the United States of America.
3. That I am disabled having been born with Cerebral Palsy. Prior to November 5, 2017 I was extremely self sufficient and ambulated very well with the use of a cane. I was a very social person and frequently attended social gatherings and enjoyed attending concerts and sporting events with my friends.

4. That I have a sister that resides in Sutherland Springs, Texas with her daughter, my niece, and the daughter's two young children.
5. Prior to November 5, 2017 I traveled to Sutherland Springs, Texas to visit my sister and her family. I spent most of the week with my sister and saw my niece on the evening of November 4, 2017 when we had dinner together and talked about spending the whole day on Sunday November 5, 2017 together. My sister had to work that Sunday. My niece and her two children had planned on going to their church on Sunday and had asked me to go with them.
6. When we arrived at the church we found our seats and my niece introduced me to her fellow congregants. There was a song prior to the service and, as the pastor was about commence the service, we heard a loud noise outside. The gunman must have been shooting at the door, the doors burst open and someone yelled "everyone get down" most of us hit the floor, My niece, stood up for some reason. The shooting started and the sound was deafening. The church was small and the gunshots sounded like major explosions. In addition to the sounds of the gunshots, the smoke from the shooting and the odor of the gunpowder added to the horror. The people were being shot and the screams were bone chilling. There was blood everywhere. I looked under the pew in front of me and saw that my grand-niece, [REDACTED], was bleeding from her backside and screaming. I was totally shocked and terrified. I kept thinking that I was going to die. I crawled over to my grand nephew and covered him with my body to keep the bullets from hitting him. The shooting stopped for a short time, it must have been when the shooter reloaded. I yelled 911, we were about to get back up when the shooting began again. I saw people against the wall and thought that was safer. I told my nephew [REDACTED] to go over there. I turned around and heard my niece, Tara, tell her friend to get over to her daughter and cover her. The man on the floor in front of me was praying loudly, I knew that he would get shot because of the loudness of his voice. I was laying still not knowing what to think or what to do next. The horrible sounds of the gun explosions, smoke, odor and the people screaming and crying created extreme confusion. At that time I felt something hit my leg but I was so in such severe

shock that it did not register immediately that it was a bullet. The gunman was shooting anyone that he had shot that was still moving. I was in such shock that I was unable to move. That may have saved my life. I believe that the gunman thought that I was dead. Eventually the shooting stopped again. I assume that is when the gunman reloaded and commenced the carnage all over again and was shooting at anything that moved. My niece, Tara, was yelling "stop stop". I wanted to tell her to keep quiet, we held hands and suddenly she let go. I assume that is when she got shot and killed. I moved further under the pew. I was waiving for my nephew to come back to me and take cover. He was out in the open and said that he could not move. I looked at him and saw that he had been hit in the leg. I wanted to go to him, but I could not move. I managed to get to my phone and I texted my sister to call the police that the church was under attack. I was in such a distressed state that I did not realize that my phone was in airplane mode and that is why my 911 call was not going through. I eventually got my phone to work and got through to 911. I heard more shooting outside and told 911 that he was coming back inside. I hung up fearing that he was coming in and would hear me talking and kill the rest of us. The shooting that I heard was actually a shoot out between the gunman and a very brave neighbor. My nephew got his phone out and called 911 and told them where we were. At that time I saw boots from my vantage point on the floor, I thought that it was the gunman and told my nephew to keep quiet. I saw more boots and looked up and it was the SWAT team coming to help us.

7. When I realized that I was safe I raised my hands to show that I was unarmed. They lowered their weapons as they looked around in shock at what they saw. I reached down to my niece, Tara, and told her that the police are here and to get up. She did not move. I shook her and she was still not moving. I told her to wake up we are safe. I did not realize that she was dead until I saw the blood coming from her head. I then stood up and directed one of the police officers to take care of [REDACTED] and [REDACTED].
8. I then saw my sister, Lisa McNulty, walk in talking to the police. I called her over and told her that the kids were alive, but injured. I then told her about her daughter. She reached over and felt for a pulse and there was none. [REDACTED] was getting pulled out to be examined by the EMTs and she was screaming in pain.

9. My sister helped me get my cane. She then let me lean on her to walk to her truck. I felt blood running down my leg and then I realized that I had been shot. I stayed outside while my sister went back into the church to check on her daughter and grandchildren. I saw [REDACTED] being brought out and he was laid on the ground. I asked a gentleman that was standing next to me to help me get to [REDACTED]. I laid down next to him and held his hand.
10. More people were being brought out and neighbors were showing up. A man yelled "where is the damn ambulance" as a young boy, riddled with bullets, lay next to [REDACTED]. EMTs arrived and they saw that my hand was bleeding in addition to my leg. They bandaged my wrist and my leg.
11. [REDACTED] and [REDACTED] were both taken by ambulance to the hospital. As soon as they were in the ambulance my sister got her friends to help me into her truck. We followed the ambulance to the military hospital in San Antonio. I was helped out of the truck and into a wheelchair. I was examined and they found that I had wounds on my wrist, ankle and a major bullet wound on my leg. The bullet had gone in one side of my leg and out the other.
12. I was admitted to the hospital and was treated for the rest of that day and the next. I was still in a state of shock which took at least twenty four hours to wear off.
13. The next day my sister brought me a change of clothes and we went to the floor where the kids were being treated. Even though I was with them when they were shot and lived through that horror I suffered a major shock when I saw that both children had suffered major injuries.
14. The following day I made the trip back to New York. The airline provided extra security for me. As I came into the Albany Airport, the FBI and local police met me at the plane door and made sure that I deplaned first because the reporters were waiting for me out front. They arranged for my friend, who was picking me up, to drive out to the plane and then gave us a police escort away from the reporters.
15. I was confined to a wheelchair for two months. After that I was able to use a walker, but I can no longer use my cane and my disability was made much worse as a result of the shooting.
16. I was treated by a visiting nurse for three months at home. The nurse was necessary to give me my meds, treat the open wound and change the bandages on all three wounds. I was fortunate to have additional help for that time to assist me in my daily life. I



had someone to cook my meals, assist me in bathing, dressing and shopping.

17. As horrible as the physical injuries that I sustained as a result of the massacre were they eventually healed even though I was left significantly more physically disabled than I was before the shooting. The mental disability was significantly more devastating than the physical one. I have nightmares that relive that scene every night and most times I cannot sleep at night and wind up sleeping during the day for an hour or two. I cannot go to meetings with groups of people or to movies, concerts or sporting events. I always enjoyed going to Church, but that is an impossibility for me now. The mere sight of a pew sends me into a panic. I am fearful of going out of my apartment and am constantly looking over my shoulder.
18. I have Post Traumatic Stress Disorder and am under the care of a Psychologist and will be under treatment and medication for the rest of my life.
19. Every time that there is a mass shooting it brings back those horrible images of the massacre at the Sutherland Springs Church and I suffer major panic attacks. I take medication but that only helps a little.
20. I have tried the best that I can to narrate the horror that I experienced in the Sutherland Springs Church on that fateful Sunday, November 5, 2017. It is, however, impossible to describe adequately to anyone that was not there, the fear, panic, thoughts of impending death, horror and anger that I experienced at that time. It is a nightmare that I live with every day and every day I think of my beautiful niece and the rest of the parishioners that lost their lives or suffered horrific injuries as a result of that senseless and evil act of violence.

Under 28 U.S.C. Section 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct

EXECUTED on this 14<sup>th</sup> day of August, 2019.

  
SIGNATURE OF MARGARET MCKENZIE



IN THE UNITED STATES DISTRICT FOR  
THE WESTERN DISTRICT OF TEXAS  
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	§	5:19-cv-00706-XR ( <i>Looknngbill</i> )
	§	5:19-cv-00714-XR ( <i>Solis</i> )
	§	5:19-cv-00715-XR ( <i>McKenzie</i> )
	§	5:19-cv-00805-XR ( <i>Curnow</i> )
	§	5:19-cv-00806-XR ( <i>Macias</i> )

**DECLARATION**

I am Kris Workman, and I declare the following as true and correct:

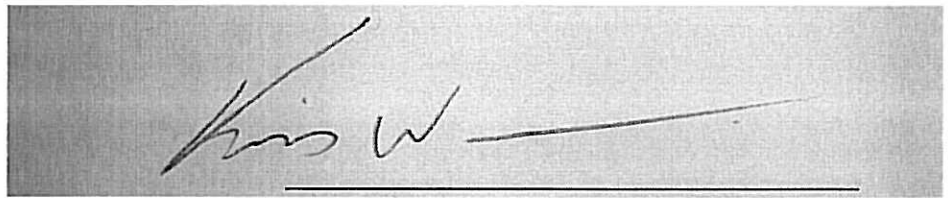
- 1) I am of sound mind, over the age of 18, and have personal knowledge of the facts contained in this declaration.
- 2) I am the worship leader at the First Baptist Church of Sutherland Springs, Texas, where I attended as a member for about eight years prior to the shooting on November 5, 2017.
- 3) When the shooting started, I was sitting near the front and was one of the furthest people away from the door where the gunshots started.

**Ex. E**

- 4) The worship service had started before the gunshots began. The praise team had taken seats in the pews after singing at the beginning of the service. I and my mother Julie Workman were seated in the front pew.
- 5) Popping noises suddenly began from outside the church. I heard someone yell to get down, and I laid on the floor next to my mother, partially under a pew. After shooting from outside the church, I could tell at some point that the shooter entered because the shots became louder. He shot consistently for about eleven minutes.
- 6) I could hear yelling and screams as people were shot. At one point the shooter walked up and down the aisles of the church and between the pews, shooting at anyone who made noise or moved. I knew people were injured and dying. My mother and I decided to play dead, make no noise and not move.
- 7) I laid face down on the floor as I heard him approach me. I did not move. I felt a sudden sharp pain in my low back at the same time I heard a gunshot. I could not move my legs. I began to cry out in pain. My mother told me to "shut up." I did.
- 8) I saw Greg Hill get shot and saw later that he was dead. I later saw Brian Holcombe on his back with his eyes open and not moving. I knew he was dead. I saw others dead as well.
- 9) Before the shooter left the church, he drew his sidearm and shot me in the intestines. I do not know why unless he knew I was not dead. I could not move thereafter.
- 10) I remember my father Kip Workman entering the church very shortly after the shooting ended and approaching me. He tried to help and I told him I could not move. I know my mother was hit but saw her get up from the floor and use her nursing skills to try to save people
- 11) I will never forget that day or the twenty six people who I believe were promoted to Glory that day, even though I remain sad that they were killed by the sick acts of evil.

Under 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on this 22nd day of August, 2019.

A handwritten signature in black ink on a light gray background. The signature appears to be "Kris W" followed by a long horizontal line.

SIGNATURE OF KRIS WORKMAN

IN THE UNITED STATES DISTRICT FOR  
THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JOE HOLCOMBE, et. al,	§	NO. 5:18-CV-00555-XR
	§	
Plaintiffs	§	Consolidated with:
	§	5:18-cv-00712-XR ( <i>Vidal</i> )
	§	5:18-cv-00881-XR ( <i>Uhl</i> )
vs.	§	5:18-cv-00944-XR ( <i>Ramsey</i> )
	§	5:18-cv-00949-XR ( <i>McNulty</i> )
UNITED STATES OF	§	5:18-cv-00951-XR ( <i>Wall</i> )
AMERICA,	§	5:18-cv-01151-XR ( <i>Amador</i> )
	§	5:19-cv-00184-XR ( <i>Brown</i> )
Defendant	§	5:19-cv-00289-XR ( <i>Ward</i> )
	§	5:19-cv-00506-XR ( <i>Workman</i> )
	§	5:19-cv-00678-XR ( <i>Colbath</i> )
	§	5:19-cv-00691-XR ( <i>Braden</i> )
	§	5:19-cv-00706-XR ( <i>Lookngbill</i> )
	§	5:19-cv-00714-XR ( <i>Solis</i> )
	§	5:19-cv-00715-XR ( <i>McKenzie</i> )
	§	5:19-cv-00805-XR ( <i>Curnow</i> )
	§	5:19-cv-00806-XR ( <i>Macias</i> )

**DECLARATION**

I am David Colbath, and I declare the following as true and correct:

- 1) I am of sound mind, over the age of 18, and have personal knowledge of the facts contained in this declaration.
- 2) On the morning of November 5, 2017, I attended Sunday School and church at the First Baptist Church of Sutherland Springs.
- 3) I happened to sit in one of the rear pews that day close to the doors. I heard popping noises outside the church that continued around the sides of the church.
- 4) I figured out from the holes in the walls that the noises were gunshots and that someone was shooting into the church.



- 5) I stood up just as I noticed holes appear in the doors of the church behind me and yelled at people in the church to get down. I waived my right arm as I did so.
- 6) Just as I turned with my right arm, a bullet tore through my arm and knocked me down. I lost a large portion of my right forearm from that shot alone.
- 7) I started crawling on my elbows toward the front pews, and away from the gunshots. I remember getting hung up as I crawled forward, after the shooter entered the church and started shooting people from inside the church.
- 8) Someone who was shot fell on me and I could not crawl anymore. As I had crawled forward, I remember saying over and over: "I love you Jesus. I love you Olivia (my daughter). I love you Morgan (my son)."
- 9) Another body fell on top of me. I remember the shooter standing over me and shooting down into the bodies on top of me. I could feel the impacts of the bullets, some of which went through the bodies on top of me into my buttocks.
- 10) I was shot in the ankle. I remember the shooter holding the gun against my neck and firing. I remember feeling a sensation in my chest after that gunshot. I later learned that the gunshot had fired down through my neck and back up into my ribcage, lodging in my chest near my heart.
- 11) I was shot at least eight times but didn't know it at the time. I had difficulty breathing as the shooting continued because of bodies on top of me and from bleeding. I knew I was bleeding and was losing consciousness.
- 12) I knew people were dying all around me. I could not move. When the shooting stopped, I lay there until someone came in and I begged that person to move the body off the top of me so I could breathe. I said: "Help me. Help me. Could you at least get this guy off my back so I can breathe?" They did.
- 13) I vaguely remember someone I later found out was a game warden putting a tourniquet on my shoulder.
14. I remember leaving the church on a gurney and beginning to feel horrible pain everywhere once they placed me on the gurney for transport.
15. I knew many of my friends were dead or dying and did not know which ones had survived as they took me out of the church that day.

Under 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on this 23 day of August, 2019.

A handwritten signature in black ink, appearing to read 'D. Colbath', written over a horizontal line.

SIGNATURE OF DAVID COLBATH

IN THE UNITED STATES DISTRICT FOR  
THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JOE HOLCOMBE, et. al,	§	NO. 5:18-CV-00555-XR
	§	
Plaintiffs	§	Consolidated with:
	§	5:18-cv-00712-XR ( <i>Vidal</i> )
	§	5:18-cv-00881-XR ( <i>Uhl</i> )
vs.	§	5:18-cv-00944-XR ( <i>Ramsey</i> )
	§	5:18-cv-00949-XR ( <i>McNulty</i> )
UNITED STATES OF	§	5:18-cv-00951-XR ( <i>Wall</i> )
AMERICA,	§	5:18-cv-01151-XR ( <i>Amador</i> )
	§	5:19-cv-00184-XR ( <i>Brown</i> )
Defendant	§	5:19-cv-00289-XR ( <i>Ward</i> )
	§	5:19-cv-00506-XR ( <i>Workman</i> )
	§	5:19-cv-00678-XR ( <i>Colbath</i> )
	§	5:19-cv-00691-XR ( <i>Braden</i> )
	§	5:19-cv-00706-XR ( <i>Lookngbill</i> )
	§	5:19-cv-00714-XR ( <i>Solis</i> )
	§	5:19-cv-00715-XR ( <i>McKenzie</i> )
	§	5:19-cv-00805-XR ( <i>Curnow</i> )
	§	5:19-cv-00806-XR ( <i>Macias</i> )

**DECLARATION**

I am ROSANNE SOLIS, and I declare the following as true and correct:

- 1) I am of sound mind, over the age of 18, and have personal knowledge of the facts contained in this declaration.
- 2) On November 5<sup>th</sup>, we got up like we usually do and went for coffee in Stockdale. Coming back from the store, we passed by the church but we didn't stop. Once home, Joaquin took off his shoes and said he didn't want to go to church. "No, we need to go today because we need to give thanks to the Lord for what he does for us."
- 3) We went back to the church, arriving around 11:10 am.

- 4) We went inside and sat on the left-hand side, third row. The people Devin Kelley was looking for always sat in front of us.
- 5) The kids were playing around. A lady was giving the announcements telling us that Pastor wasn't there.
- 6) We were singing for about 5 to 10 minutes when the shots started coming from the top. Someone yelled out, "everybody down, somebody is shooting at us from the roof." Joaquin and I ducked under the pews. I could see all the shots coming over me, hitting all over the floor. They were coming fast, fast, fast. Joaquin got on top of me. "No, you have to leave. Both of us are going to die here. Go hide somewhere." Joaquin went somewhere to hide.
- 7) So many people that I knew died that day. There was a lot of smoke in the church. It created a terrible smell.
- 8) Devin Kelley stopped shooting for a little while, reloaded and started shooting again. He came into the church. I could see his feet. He was all dressed in black. He shot the people at the back of the church first.
- 9) I could see the little boy next to me screaming. I could see he was shot in the arm.
- 10) I was begging the Lord not to let me die that day.
- 11) The shots kept coming. I thought was losing my mind. I moved myself around under the pew to face a different direction and I crawled to the end of the pew. By this time, I had already been shot.
- 12) I had a lot of blood on me, but I didn't know where it was coming from. I was scared. I was playing like I was dead. I didn't think it was real. I thought I was in another world. I stayed there as quiet as I could be.
- 13) A lady next to me grabbed her phone to call 911 but I motioned to her to stay quiet because I knew he would hear her and come and kill us.
- 14) I saw one lady on the same row as me that was surrounded by a pool of blood. I knew she was dead.
- 15) I could see Devin Kelley's feet. He was firing all over the place.
- 16) Kelley was firing and firing when suddenly he stopped and took off running.
- 17) Everyone was screaming, "God, where is the police, where is the ambulance?"



- 18) I crawled outside the front door. I saw a man dead on the grass. He had been sitting near us before the service started. Another man was carrying a little girl out of the church.
- 19) I was screaming Joaquin's name because I hadn't seen him. I saw my sister and Joaquin approach me. My sister drove me to the hospital.

Under 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on this 22nd day of August, 2019.

  
SIGNATURE OF ROSANNE SOLIS

IN THE UNITED STATES DISTRICT FOR  
THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JOE HOLCOMBE, et. al,	§	NO. 5:18-CV-00555-XR
	§	
Plaintiffs	§	Consolidated with:
	§	5:18-cv-00712-XR ( <i>Vidal</i> )
	§	5:18-cv-00881-XR ( <i>Uhl</i> )
vs.	§	5:18-cv-00944-XR ( <i>Ramsey</i> )
	§	5:18-cv-00949-XR ( <i>McNulty</i> )
UNITED STATES OF	§	5:18-cv-00951-XR ( <i>Wall</i> )
AMERICA,	§	5:18-cv-01151-XR ( <i>Amador</i> )
	§	5:19-cv-00184-XR ( <i>Brown</i> )
Defendant	§	5:19-cv-00289-XR ( <i>Ward</i> )
	§	5:19-cv-00506-XR ( <i>Workman</i> )
	§	5:19-cv-00678-XR ( <i>Colbath</i> )
	§	5:19-cv-00691-XR ( <i>Braden</i> )
	§	5:19-cv-00706-XR ( <i>Lookngbill</i> )
	§	5:19-cv-00714-XR ( <i>Solis</i> )
	§	5:19-cv-00715-XR ( <i>McKenzie</i> )
	§	5:19-cv-00805-XR ( <i>Curnow</i> )
	§	5:19-cv-00806-XR ( <i>Macias</i> )

**DECLARATION OF MARGARETTE VIDAL**

I am Margarete Vidal, and I declare the following as true and correct:

- 1) I am of sound mind, over the age of 18, and have personal knowledge of the facts contained in this declaration.
- 2) In November of 2017, I woke up and got ready for church like I have for the past 15 years.
- 3) That Sunday morning, I walk into the church and greeted everyone. We were talking about the Fall Festival that had happened the week before.
- 4) I started to sit in the back of the church where I usually sit. I sat next to the Johnsons.

- 5) I heard something like shots, and we all started to get down under the bench. I started praying. I was saying, "Jesus help us."
- 6) I looked to my right and I knew the couple next to me had passed. I could see the blood.
- 7) I put my head down and was just praying when I felt a shot to my leg. All I remember was feeling something hot and burning and after that I fainted.
- 8) Next, I just remember being at the hospital and seeing doctors and nurses around me. I was later told that a lot of my friends died that day and I was so sad. They were my family.

Under 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on this 16th day of August, 2019.

Margarette Vidal  
Margarette Vidal (Aug 16, 2019)

SIGNATURE OF MARGARETTE VIDAL

IN THE UNITED STATES DISTRICT FOR  
THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JOE HOLCOMBE, et. al,	§	NO. 5:18-CV-00555-XR
	§	
Plaintiffs	§	Consolidated with:
	§	5:18-cv-00712-XR ( <i>Vidal</i> )
	§	5:18-cv-00881-XR ( <i>Uhl</i> )
vs.	§	5:18-cv-00944-XR ( <i>Ramsey</i> )
	§	5:18-cv-00949-XR ( <i>McNulty</i> )
	§	5:18-cv-00951-XR ( <i>Wall</i> )
UNITED STATES OF	§	5:18-cv-01151-XR ( <i>Amador</i> )
AMERICA,	§	5:19-cv-00184-XR ( <i>Brown</i> )
	§	5:19-cv-00289-XR ( <i>Ward</i> )
Defendant	§	5:19-cv-00506-XR ( <i>Workman</i> )
	§	5:19-cv-00678-XR ( <i>Colbath</i> )
	§	5:19-cv-00691-XR ( <i>Braden</i> )
	§	5:19-cv-00706-XR ( <i>Lookngbill</i> )
	§	5:19-cv-00714-XR ( <i>Solis</i> )
	§	5:19-cv-00715-XR ( <i>McKenzie</i> )
	§	5:19-cv-00805-XR ( <i>Curnow</i> )
	§	5:19-cv-00806-XR ( <i>Macias</i> )
	§	

**DECLARATION**

I am John Porter Holcombe, II, and I declare the following as true and correct:

I am of sound mind, over the age of 18, and have personal knowledge of the facts contained in this declaration.

**Ex. I**

1. I, John Holcombe, was in the sound booth in the sanctuary of First Baptist Church of Sutherland Springs, Texas, on November 5, 2017. I was recording (video camera), Morgan Harris was running Sound, and Bob Braden was also in the sound booth working with us.
2. Prior to church service starting, my mom (Karla Holcombe) walked by the sound booth and asked me if I could remove the recording of her announcing Pastor Appreciation Sunday, as it was supposed to be a surprise for Pastor Frank and his family.
3. When the church service started, I started the video recording.
4. During the worship service, prior to welcome and announcements, I saw what appeared to be a bullet shot into the left wall from the outside. I looked over at Bob Braden, he appeared to notice it too.
5. My mom went forward for welcome and announcements. She was in the process of announcing Pastor Appreciation Sunday when the door opened. I didn't recognize who it was. The man at the door was dressed in tactical gear and announced "First Baptist Church of Sutherland Springs". and something to the effect of "Today you're all going to die".
6. I don't think mom clearly heard what he said, and she said "Hello".
7. Kelly began shooting and mom screamed. I made eye contact with mom, and looked out over the crowd and saw that Crystal (my wife) and the kids were in the congregation. Up to that point I didn't know if they were there or not. Mom fell down, Crystal appeared to have got up and was walking the kids over to the left wall.
8. I dropped to the floor as bullets were being shot and immediately began to dial 911. I tried at least three times to dial 911. Each time I dialed 911, I got a busy signal.
9. Kelly ran out of bullets, and I was briefly relieved, only to hear another clip get loaded and the gunfire started back up. Kelly went through several clips of ammunition.
10. I tried getting out through the sound booth door, but Bob Braden was against the door and he waved me to get down. I said "we have to do something" and he waved me to get down.



11. Kelly had been shooting and the sheetrock dust and smoke filled the room, it was difficult to see. There was a short period during this time where Kelly paused firing and commented something ugly. I don't remember what he said – I believe he was commenting on how dusty it was. Meanwhile there were horrifying moaning sounds from people dying. Just groaning, moaning sounds. A death groan, resonating throughout.
12. I eventually tried to dial the Wilson County Sheriff Office main number, 830-393-2535, and after a couple tries, I got through. I begged the dispatcher to send help.
13. Kelly was continuing to shoot and I saw somebody's tooth land next to me. I don't know who's it was, but I can't help but think it was Crystals.
14. I was shaking my foot, probably from anxiety. I couldn't really see, but I was laying on the floor of the sound booth. I faced away from where Kelly was because I didn't want to make eye contact with him.
15. I believe the shaking of my foot may have attracted him to me. He started shooting at me. All I could feel were the thumps, and I could hear wood. He shot at me several times. I didn't see him, but I believe he was standing on the pew near the sound booth, shooting. I figured I was going to die.
16. The entire time this was going on, I was whispering, "Come out of him in the name of Jesus". I believe that he was possessed.
17. He shot me in the back a few times. The bullets appeared to have been broken up and were fragmented in my lower back.
18. I was still shaking my foot, and Morgan Harris grabbed my foot. When she grabbed my foot, it occurred to me that I probably needed to stop shaking my foot. When I stopped moving my foot, Kelly stopped shooting at me.
19. I continued to hear more gunfire from Kelly.
20. At some point, I heard a different gun (from outside), and I knew it must have been someone else. I felt relieved that someone else was shooting (hopefully at Kelly).

21. I heard a vehicle take off.
22. I tried to call Pastor Frank Pomeroy, but he texted back that he was busy.
23. I then texted Pastor Frank that someone had shot up the church.
24. The death moans were no more, but eventually survivors were praising Jesus. I honestly was not praising Jesus. From my perspective, He let that happen – similar to what you see in the Book of Job.
25. I left the sound booth and saw Crystal and the kids piled up laying against the wall, and what he did to them. Crystal's entire face was gone. She was wearing the purple maternity sweater I got her on my birthday. I knew my first child was dying inside her. I was screaming "Crystal". "██████" "██████" "██████". I saw what was left of mom. I was just in shock.
26. I tried to go toward Crystal to hold her hand, but people wouldn't let me go near her. And told me I needed to be strong or get a grip or something to that effect. An officer came in brandishing a gun and told me I needed to leave. Another officer (Manny) told me I could stay. The other officer (not Manny – one of the La Vernia officers) again told me I needed to leave.
27. I let Farida Brown borrow my phone and she left it there in the building. I didn't get my cell phone back until at least a week later.
28. I left the building and saw people outside. I saw my niece ██████ die in my sister-in-law Jennifer's hands. ██████ asked me if I could help him, that he was in pain, and about that time paramedics put him on a stretcher. He was obviously hurting and in pain when they moved his knee. I saw several other people outside.
29. I later found ██████ in a nearby house. I sat with her and held her and rocked her for some time. She had just witnessed the murder of her mother Crystal, her brother ██████ her sister ██████ her sister ██████ her unborn sibling ██████, her grandfather Bryan (Grumpy), her grandmother Karla (MorMor), her uncle Danny, and cousin ██████, and many friends. She had been drenched in their blood, and they (her rescuers) washed her off.



30. I carried [REDACTED] back toward the church and we got in an ambulance and were taken to University Hospital.
31. At University Hospital, we ([REDACTED] and I) were immediately separated and stripped. They cut off our clothes. Our shoes were taken by the police and we have never seen our shoes back.
32. They checked everything...
33. They gave me a CT Scan with contrast.
34. They wheeled me into a room. [REDACTED] and I were still separated. I wasn't happy about this.
35. I talked with various investigators. They came in and took pictures of where I was shot.
36. A person came to sit with me. He just sat there. Later I got a bill from him. He did nothing but sit there and look at me.
37. Someone came in the room with tweezers and began digging out the bullet pieces that were in my back. He put the bullet pieces in a dish. I could hear the clanking sound every time he'd drop a bullet piece in this container.
38. Eventually they put me in a different room and talked with me about suicide and that they were concerned that I was going to commit suicide because of the gravity of what happened.
39. [REDACTED] and I were not re-united until about close to midnight, where they finally allowed me to go to the same room she was in. I do wish they would not have kept us separated that long.
40. I was in the hospital room with Carolyn Hill ([REDACTED]'s paternal grandmother, my mother-in-law on Pete's side) and [REDACTED] Hill (my stepdaughter).
41. The hospital room we stayed in had what I believe was a pipe in the wall, and this pipe would occasionally jolt and make a loud banging sound, that sounded much like gunfire. Just when I'd be about to fall asleep, BANG.
42. Throughout the night there were several interruptions from various investigators and the attorney general office for various purposes.



Under 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on this 21<sup>st</sup> day of August, 2019.

  
\_\_\_\_\_  
SIGNATURE OF JOHN PORTER HOLCOMBE, II

IN THE UNITED STATES DISTRICT FOR  
THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JOE HOLCOMBE, et. al,	§	NO. 5:18-CV-00555-XR
	§	
Plaintiffs	§	Consolidated with:
	§	5:18-cv-00712-XR ( <i>Vidal</i> )
	§	5:18-cv-00881-XR ( <i>Uhl</i> )
vs.	§	5:18-cv-00944-XR ( <i>Ramsey</i> )
	§	5:18-cv-00949-XR ( <i>McNulty</i> )
UNITED STATES OF	§	5:18-cv-00951-XR ( <i>Wall</i> )
AMERICA,	§	5:18-cv-01151-XR ( <i>Amador</i> )
	§	5:19-cv-00184-XR ( <i>Brown</i> )
Defendant	§	5:19-cv-00289-XR ( <i>Ward</i> )
	§	5:19-cv-00506-XR ( <i>Workman</i> )
	§	5:19-cv-00678-XR ( <i>Colbath</i> )
	§	5:19-cv-00691-XR ( <i>Braden</i> )
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	§	5:19-cv-00714-XR ( <i>Solis</i> )
	§	5:19-cv-00715-XR ( <i>McKenzie</i> )
	§	5:19-cv-00805-XR ( <i>Curnow</i> )
	§	5:19-cv-00806-XR ( <i>Macias</i> )

**DECLARATION OF FARIDA BROWN**

1. My name is Farida Brown. I live in Chambers County, Texas. I am over eighteen years old and have personal knowledge of the facts in this declaration. I lived in La Vernia, Texas - near Sutherland Springs - for more than 20 years with my husband, who is now deceased, and attended First Baptist Church in Sutherland Springs, Texas.

2. After my husband passed away, I moved to the Houston area to be closer to two of my children. When Hurricane Harvey hit Houston, their homes were flooded and I returned to La Vernia to live with another of my children who still lived in the area. I attended church at First

Baptist Church in Sutherland Springs multiple times every week between August 2017 and the time that I was shot and my friends were shot and killed in church on November 5, 2017.

3. On the morning of November 5, 2017, I was in church, sitting in a pew toward the back of the church, near the door leading to the street, on the left side of the center aisle. When church started, we sang praise hymns and then it was the time for announcements. The lady doing the announcements reminded us that our pastor was in Oklahoma doing training, and talked about what a wonderful Fall Fest we had the week before. She talked about the costume I wore and gave an award to Julie for her costume.

4. It was during the announcements that I first heard the gunshots. They sounded like fireworks at first, but I soon realized that they were not fireworks. The man sitting next to me, Dave, stood and screamed at us to stay down. He went into the hallway and got shot. Many people in the church were screaming. Some were running and some tried to hide under the church pews. I was one of the people who hid under the church pew. I had been sitting next a young lady. We got under the pews and prayed. The gunman came into the church wearing black and carrying a rifle, wearing a bullet proof vest, and shooting people under the pews, and shooting the people who were running for the exit doors. The gunman walked up and back the pews firing as he went.

5. Eventually, he ran out of bullets and went outside to reload. I remember holding the hand of the girl lying next to me. I told her "you heard what the man said, we are all going to die, ask for forgiveness and surrender yourself to God, put it in his hands, give him your soul and we will go to heaven." I held her hand really tight and prayed for her and she died later holding my hand.

6. Then he came back inside and started firing again. The gunman told the church that he was going to kill all of us. Every time someone moved, he shot them. I was under the pew, praying with the young lady next to me. A girl next to me on the right was shot up and begging for help.



I told her to be quiet. The gunman spent most of his time shooting the people in the front of the church on the right, people he knew who were counseling his wife. The gunman heard the girl next to me and turned and fired at us through the pews. The shrapnel from the pew shot into my legs. Then I saw his boots in the aisle and he opened fire again. The man next to me was shot multiple times. I was shot through the legs with one bullet and with pieces of metal and wood from the church pew that he shot through to get to us. The gunman saw us lying there and came at me, pointing his gun at my head, to finish me off, when he ran out of bullets.

7. He went outside to reload again. I was told later that a neighbor shot at the gunman and made him drive away.

8. Soon after, the police came, then paramedics. The police told me to get up, that they would protect us. I was too scared to get up. When the paramedics came, I tried to stand up but fell back to the floor. I was taken outside by a policeman or fireman who carried me and put me down next to other people who had been shot and killed. One of my daughters, who lived in La Vernia, came to the church right away, with my grandchildren, to try to care for me, and was there when I went into the ambulance.

9. My kids were there in the hospital when I woke up. My son told me that I had been in surgery for two hours. The doctor came in and told me that I was lucky to be alive and that I had pieces of shrapnel that were still in my legs. There are five pieces of shrapnel that are still in my legs, that are too close to arteries to remove.

10. I was in the hospital for two days, then sent to my daughter's home and cared for there by home health nurses and therapists. I stayed in La Vernia for two months, then was cleared to come to Houston to live with my son and his family, where I continued therapy and cared for my wounds.

myself. I had a large hole in my leg that took months to heal, and now has an ugly scar. I can't walk up and down more than a couple of stairs at a time.

11. The first funeral I went to was for my best friends, Theresa and Richard. I walked in very slowly and tried to stand at the funeral, but saw their bodies and couldn't keep my composure. I cried and screamed, asking God why it wasn't me who died. I felt weak and dizzy and fell down. Two pastors put me in a wheelchair and sent me home. I wished I could have died with them. Some other funerals I went to, I was in a wheelchair because the pain in my legs and in my heart was unbearable.

12. I moved back to the Houston area to live with my son and his family, but couldn't stay in their home long because they have a two-story house with all the bedrooms upstairs and I was not safe to use the stairs. I moved about forty minutes away into a one-story house with a friend who can help take care of me.

13. People who I don't know, who claimed that we made up the church shooting, threatened to kill me and my family, and all the survivors and pastor, saying the shootings never happened.

14. Before I was shot, I walked, danced and gardened. I went to the beach with my friends. Now, I can't dance, I can't walk for long and I can't get on my knees to garden. I can see my grandkids but they can't sit on my lap due to the damage in my legs.

15. My legs hurt all the time. I have nightmares. Loud sounds outside, from the TV, or fireworks, terrify me. I go to counseling and it helps, but nothing can take away the pain in my legs and the pain in my heart. I don't know why I was left alive and the girl next to me was killed. I lost my best friends in the place where I came to worship God and this devil of a man came inside and shot us all.

16. Under 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Farida Brown 8-20-19  
Farida Brown



IN THE UNITED STATES DISTRICT FOR  
THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JOE HOLCOMBE, et. al,	§	NO. 5:18-CV-00555-XR
	§	
Plaintiffs	§	Consolidated with:
	§	5:18-cv-00712-XR ( <i>Vidal</i> )
	§	5:18-cv-00881-XR ( <i>Uhl</i> )
vs.	§	5:18-cv-00944-XR ( <i>Ramsey</i> )
	§	5:18-cv-00949-XR ( <i>McNulty</i> )
UNITED STATES OF	§	5:18-cv-00951-XR ( <i>Wall</i> )
AMERICA,	§	5:18-cv-01151-XR ( <i>Amador</i> )
	§	5:19-cv-00184-XR ( <i>Brown</i> )
Defendant	§	5:19-cv-00289-XR ( <i>Ward</i> )
	§	5:19-cv-00506-XR ( <i>Workman</i> )
	§	5:19-cv-00678-XR ( <i>Colbath</i> )
	§	5:19-cv-00691-XR ( <i>Braden</i> )
	§	5:19-cv-00706-XR ( <i>Lookngbill</i> )
	§	5:19-cv-00714-XR ( <i>Solis</i> )
	§	5:19-cv-00715-XR ( <i>McKenzie</i> )
	§	5:19-cv-00805-XR ( <i>Curnow</i> )
	§	5:19-cv-00806-XR ( <i>Macias</i> )

**DECLARATION**

I am Deborah Braden, and I declare the following as true and correct:

- 1) I am of sound mind, over the age of 18, and have personal knowledge of the facts contained in this declaration.
- 2) On November 5, 2017, my husband Keith Braden, our granddaughter, Z.Z., and I were in the back pew of First Baptist Church of Sutherland Springs. My friend, Karla Holcombe was making announcements about Pastor Frank being at class for training for a camp coming up in June. Then the first gunshot came through the wall just up over my head! There was confusion because we couldn't make sense of what was happening. Suddenly many more bullets were coming from outside.

- 3) Several people yelled "get down on the ground". Screaming, crying, yelling for help could be heard all around us.
- 4) My husband also told us to get down and stay down. I put 6-year-old Z.Z. on the floor and covered her with my body. By then the bullets were coming from low (floor level) on the side where we were. I tried to hold Z.Z. away from the gunfire, with no luck. I grabbed my bag with my Bible to put space between the wall where the gunfire was coming from and her.
- 5) Keith and I had our feet toward each other, feet to feet. He kept saying stay down and be quiet. I saw a big chunk come out of my right arm and Z.Z. was shot in her abdomen. I know she saw my arm injury and was very scared. She told me it hurt, and she wanted to scream. I told her "Do Not" and "Please Be Quiet". She was having trouble breathing and I told her she had to keep breathing and to stay with me. By then we were whispering and praying. Gunshots were still all around. I was not sure if the gunman was inside or outside at that point but there were time periods of firing from both inside and outside the church. Every time someone would cry or call out there were more gunshots. I was covering Z.Z.'s tummy injury with my hand and praying for it to stop! After what seemed forever, the shooting stopped. I pulled my shirt off to cover the hole in Z.Z.'s abdomen. I was not aware of her leg injuries. People started crying out for help.
- 6) My husband asked if we were okay. We kicked each other's feet to let each other know we were alive. He was on his stomach.
- 7) Bob, my son, came down from the sound booth with blood on his head. He could not get to me and Z.Z. but was able to talk to Keith and be with his daddy in his final moments. I thank God for that. Keith asked him about us, and I gave him a thumbs up that we were ok – at least alive.
- 8) I saw baby N., dead under the pew in front of Keith. Danny, her father, was dead, with his feet in my and Z.Z.'s faces. Peggy Warden, a very dear and longtime friend, was dead. Her grandson, Zach Poston, called out for help; he could not feel his legs. By then, people were moving and checking on each other. I think at this time my son Bob told me Keith had just died and I felt Keith's leg twitch and he was gone. I did not want to believe that, so I kept asking others, hoping it was not true. I had already seen the holes in my right arm but did not know I had been shot in the left hip/glute as well. I knew it hurt like heck.
- 9) The first responders came in and wanted to carry me over my husband's body. I was afraid they would step on Keith or fall.
- 10) I did not want to leave Z.Z. alone! Someone else was climbing over the pew to get to her as they were taking me out.



- 11) After we got out the door, I was set down. I saw a friend who told me her husband and baby were both dead, but she was ok. I told her I had to find Z.Z. and they sent me over to the front where the EMTs were working on Z.Z. I went to sit on the ground next to her, but an EMT made me sit on a back board and began to cut my shorts up the left leg. I asked why and they said I was shot there too! I had no phone because it was inside the church but needed to get a hold of my daughter Beth, Z.Z's mom. They were soon ready to transport Z.Z. I gave her love and told her we would be ok, and her mom would be at the hospital as soon as she could. Off Z.Z. went into the ambulance.
- 12) Another friend showed up and we called Beth and told her what had happened.
- 13) Beth went to the hospital to find her daughter, I was loaded into an ambulance with two other ladies and taken to Connally Memorial Hospital.
- 14) To my great surprise, our Z.Z. was there. I was able to see her again and give her more love and let her know her mom was to be at the hospital soon. It made me and her feel better to see we were both still okay. Then they loaded her into the helicopter to fly her for more treatment at University Hospital.
- 15) Later I was transferred to University Hospital as well. In the door, a huge group of doctors, police, and medical personnel were everywhere. I was rolled into a room with other people and they were trying to take my wedding ring. I was very upset by that. "My husband gave me that." I kept telling them they could not have it. They insisted it would be locked up in a safe. I kept asking everyone about my husband. Where was he? I was hoping someone would tell me he was there and not dead. I didn't want to believe that he was dead, I hoped and prayed it was a mistake, but it wasn't.

Under 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on this 18th day of August, 2019.

  
SIGNATURE OF DEBORAH BRADEN

IN THE UNITED STATES DISTRICT FOR  
THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JOE HOLCOMBE, et. al,	§	NO. 5:18-CV-00555-XR
	§	
Plaintiffs	§	Consolidated with:
	§	5:18-cv-00712-XR ( <i>Vidal</i> )
	§	5:18-cv-00881-XR ( <i>Uhl</i> )
vs.	§	5:18-cv-00944-XR ( <i>Ramsey</i> )
	§	5:18-cv-00949-XR ( <i>McNulty</i> )
UNITED STATES OF	§	5:18-cv-00951-XR ( <i>Wall</i> )
AMERICA,	§	5:18-cv-01151-XR ( <i>Amador</i> )
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	§	5:19-cv-00805-XR ( <i>Curnow</i> )
	§	5:19-cv-00806-XR ( <i>Macias</i> )

**DECLARATION**

I am Julie Workman, and I declare the following as true and correct:

- 1) I am of sound mind, over the age of 18, and have personal knowledge of the facts contained in this declaration.
- 2) I am a Praise Team member and congregation member at the First Baptist Church of Sutherland Springs, Texas, where I attended for a number of years since Pastor Pomeroy became the minister at the First Baptist Church of Sutherland Springs, long before the shooting on November 5, 2017. I am a registered surgical nurse employed by Christus Santa Rosa Hospital on Tree line Drive in San Antonio. I have worked for a number of hospitals in San Antonio and in Wilson County during my career of over twenty-five years as a surgical nurse.



- 3) When the shooting started, I and my two sons, Kris and Kyle were sitting in a pew near the front of the church.
- 4) Only minutes earlier before the service began, I had interacted with several of the children in the congregation who attend the church. I teach children's bible class at the church. I knew most or all of the children in the congregation.
- 5) Those children included B [REDACTED] W [REDACTED]. She approached and hugged me before the service began on November 5. She wore a blue Cinderella dress and was happy to show it to me.
- 6) I heard the popping noise outside the church and did not at first understand that the sounds were gunshots. I eventually heard someone in the back of the church yell for everyone to get down. At about the same time, we realized they were gunshots.
- 7) I moved onto the floor and tried to move under a pew. The gunman shot out the light fixtures on the ceiling and I was crawling through glass on my knees under the pew. I could feel the glass cutting open my knees. Much later, I used my knowledge to remove all the glass from my knees. It was painful.
- 8) While lying still on the floor, I could hear people yell when they were shot. I and others yelled to be quiet.
- 9) The shooter approached the front of the church after shooting many, many rounds over a time period that seemed like forever, before he approached our pew. He placed the barrel of the gun over my son Kris' back and shot him point-blank in the back. Kris began to cry out in pain. I told him to shut up. I have never said such a thing to any of my children. I knew if he made any sounds the shooter would finish him off.
- 10) Almost immediately after the shooter shot Kris, I remember feeling a hit to the chest. . I later found a shrapnel wound to my breast that I bandaged myself
- 11) Shortly thereafter, my other son Kyle jumped up off the floor and began running toward the back of the church, jumping over bodies. I heard the shooter fire almost an entire clip at Kyle as he ran. I assumed that the shooter had fatally wounded or killed Kyle because I could not see him.
- 12) Shortly thereafter, I heard someone yell from outside the church and the shooter walked out. I heard gunshots from outside and the sound of vehicles and then the shooting stopped. Everything was quiet for a minute or two.

- 13) I then heard my friend and fellow member and ex-Marine Gunny Macias, who was sitting propped on the floor against a pew with abdominal wounds, tell me "Julie. You are trained for this. Do what you know how to do." That helped me come out of the immediate shock and begin to assess wounds of victims to do what I could to save lives.
- 14) I found dead children and adults everywhere as I went around the church to check vital signs.
- 15) I found B█████ W█████ lying face down in her Cinderella dress with the back of her head blown off. She was dead.
- 16) I found thirteen year-old G█████ H█████ draped over other dead bodies with a hole in the back of his head and blood everywhere around him.
- 17) I discovered E█████ H█████ underneath her brother Greg's body. She was eleven years old. She exhibited agonal breathing, which I know from my experience of over twenty years as a registered surgical nurse is a sign of imminent death if immediate emergent care is not provided. I tried to pick her up and carry her out of the church. I had great difficulty doing so because her body was so slippery. She was covered in blood. I knew I had to get her to a first responder or she would surely die. I carried her out at about the same time I heard an ambulance arrive. I carried her to the ambulance and told them to immediately care for her. When I came out of the church the next time with another victim, I found her dead on the ground. The EMTs had removed her from the ambulance when she died and just put her body on the ground.
- 18) The church and the ground outside seemed like a war zone. Bodies were everywhere in the church. As I continued around the church before first responders came in, I found one of my best friends, Peggy Warden, dead near the back of the church with a disfigured head from gunshot wounds and blood all around her.
- 19) Peggy's grandson Z█████ F█████ was next to her, bleeding badly from gunshot wounds. I ran outside to my car and obtained towels and ran back into the church. I tore the towels and made crude tourniquets to tie onto limbs of people to stop the bleeding. I tied a tourniquet onto Z█████'s arm or he likely would have bled out.
- 20) I found M█████ H█████'s body, age nine, under E█████'s body. I checked for vital signs. There were none. M█████ was dead.
- 21) I found Crystal Holcombe. Half of her face was missing as a result of gunshot wounds. She was dead. Her child E█████ was found alive under her



by a responder. I saw that she was extremely distraught and I stopped to comfort her for a few seconds.

- 22) I found that John Holcombe was alive. Almost all of his family was dead. John was hysterical. I had to try to comfort him, attempt to calm him and help him out of the church. I knew there was nothing he could do in the church, and he was in no condition to help.
- 23) I recall within a minute or two after the shooting I found Pastor Pome-roy's daughter A [REDACTED], a fourteen year-old special needs child, laying on the floor face down. I had known A [REDACTED] for over thirteen years. I was in shock to find her dead but I knew when I found no vital signs I had to move on and find people that were alive that I could help and triage.
- 24) I found sixteen year-old H [REDACTED] K [REDACTED] lying on the floor near A [REDACTED]. I checked for vital signs and found she was dead. H [REDACTED]'s siblings were nearby and her sister was yelling and screaming in pain from her injuries. I remember helping her and applying a tourniquet and helping get first responders to attend to her when they arrived.
- 25) I called my husband Kip even before I knew it was over and told him to get to the church and that people were being shot. He was one of the first people into the church with the SWAT team who had their weapons drawn. I know he tried to help David Colbath. I realized that my son Kyle probably was dead somewhere outside the church lying in the field next to it. I told Kip to go get other people and search the field for his body. He did. I found out later that Kyle found his dad in the field, and I later learned that Kyle was alive.
- 26) I personally examined Kyle Workman and found a gunshot wound on his shoulder. He did not even realize he had been physically injured because I believe he was in shock.
- 27) I found Morgan Harris, Kyle's fiancée in the church. She came out of the sound booth at the back of the church, where she had been operating the sound mixing equipment during the service. She was bleeding from her legs. She ignored it and walked around the church with me and helped me try to save people and apply tourniquets. I did not even know how many times Morgan had been shot, or realize how seriously her legs were injured from shrapnel and lead until much later.
- 28) The entire time I was trying to help other victims, I knew that my son Kris was lying on the floor unable to move because of the gunshot wound to his back that caused immediate paralysis to both legs. He told me he could not feel them. He also was shot in the intestines. I was unable to ascertain the severity of his internal injuries. As a surgical nurse, I knew



he needed immediate surgery to find the damage, stop the internal bleeding and repair tissue and organ damage. I did not know if Kris was going to die on the floor of the church from internal bleeding. I wanted him out of the church and on a helicopter immediately, but there was nothing I could do until what seemed like an eternity before the first responders and later the helicopters arrived.

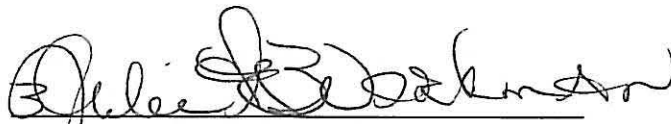
29) I found R [REDACTED] W [REDACTED] and Z [REDACTED] B [REDACTED], very young children, with multiple critical injuries in the church. I did not know if R [REDACTED] would survive because I knew he had severe internal injuries and I could do little to help him without level one trauma care. I did not have the resources available as a surgical nurse to provide anything near that level of care to anyone at the church. Nor did the first responders.

30) I almost cannot describe the feeling of knowing that day as a surgical nurse what kind of urgent sophisticated trauma care that many of these patients—my friends and students—needed but being almost totally helpless and unable to provide it except to attempt to apply tourniquets and compression to wounds and carry dying people out of the church to try to save some of them.

31) I will never forget that day. I relive it.....often.

Under 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on this 25 day of August, 2019.

  
SIGNATURE OF JULIE WORKMAN

